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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case.
No. 19-30088 (DM)*

**STIPULATION BETWEEN OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS AND DEBTORS EXTENDING
TIME TO RESPOND TO DEBTORS' EXIT
FINANCING MOTION**

[DOCKET NO. 6013]

[No Hearing Requested]

This stipulation and agreement for order (the "Stipulation and Agreement for Order") is entered into by the (i) Official Committee of Unsecured Creditors (the "Committee") appointed in

1 the jointly administered chapter 11 cases of the above-captioned debtors in possession (the
2 “Debtors” and together with the Committee, the “Parties”), on the one hand; and (ii) Debtors, on
3 the other hand. The Parties hereby stipulate and agree as follows:

4 **RECITALS**

5 A. On March 3, 2020, the Debtors filed their *Second Amended Motion for Entry of*
6 *Orders (i) Approving Terms of, and Debtors’ Entry into and Performance Under, Equity Backstop*
7 *Commitment Letters, (ii) Approving Terms of, and Debtors’ Entry into and Performance Under,*
8 *Debt Financing Commitment Letters and (iii) Authorizing Incurrence, Payment and Allowance of*
9 *Related Fees and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense*
10 *Claims* [Docket No. 6013] (the “Exit Financing Motion”), which is set for hearing before the Court
11 at 10:00 a.m. (Pacific Time) on March 16, 2020. Any response or opposition to the Exit Financing
12 Motion Application is due by 4:00 p.m. (Pacific Time) on March 12, 2020.

14 B. Counsel to the Committee has requested, and Debtors have agreed, that the time for
15 the Committee to respond to the Exit Financing Motion be extended.

17 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
18 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
19 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH**
20 **THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT**
21 **TO ORDER, THAT:**

22 1. The time for the Committee to file and serve any response or opposition to the Exit
23 Financing Motion is extended through 4:00 p.m. (Pacific Time) on March 13, 2020.

24 [Signatures on next page]
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Dated: March 12, 2020

MILBANK LLP

/s/ Thomas R. Kreller
Thomas R. Kreller

*Attorneys for Official Committee of
Unsecured Creditors*

Dated: March 12, 2020

CRAVATH SWAINE & MOORE
LLP

/s/ Paul H. Zumbro

*Attorneys for Debtors
and Debtors in Possession*